

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PEARSON EDUCATION, INC., :
JOHN WILEY & SONS, INC., :
CENGAGE LEARNING INC. AND :
THE MCGRAW-HILL COMPANIES, INC., :

Plaintiffs, :

-against-

07 Civ. 7890 (PKC)

THE TEXTBOOK GUY LLC :
D/B/A THETEXTBOOKGUY.COM, :
MATTHEW STIRLING AND :
JOHN DOES NOS. 1-5, :

Defendants. :

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DECLARATION OF WILLIAM DUNNEGAN IN SUPPORT
OF PLAINTIFFS' MOTION TO ADJUDGE DEFENDANT
MATTHEW STIRLING, CHRIST GAETANOS, ESQ. AND
RICHARD GALBO, ESQ. IN CONTEMPT

WILLIAM DUNNEGAN hereby declares pursuant to 28 U.S.C.

§ 1746 that the following is true and correct:

1. I am a member of the bar of this Court and the firm
of Dunnegan LLC, attorneys for plaintiffs in this action.

2. Attached is a true copy of the transcript of the
proceeding before the Court in this action on June 20, 2008.

3. I am not aware of any effort that any person has
made since that June 20, 2008 proceeding to comply with the
Court's final judgment and permanent injunction entered March 5,

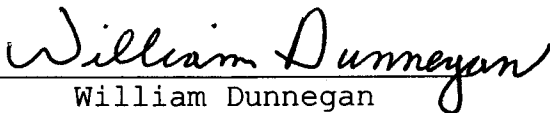
2008 in this action.

4. Plaintiffs have previously presented and obtained two orders to show cause concerning the enforcement of the final judgment in this action. Neither order to show cause sought any relief against Christ Gaetanos, Esq. or Richard Galbo, Esq. The initial order sought relief against defendant Matthew Stirling, but not the identical relief sought on this motion.

5. Plaintiffs are proceeding by order to show cause rather than notice of motion because of the urgency of the relief requested and the potential desirability of consolidating this supplemental application with the adjourned return date of the second order to show cause, currently set for July 2, 2008 at 11:30 a.m.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 2008.


William Dunnegan